

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	Chapter 11
GALLERIA 2425 OWNER, LLC,	§	Case No. 23-34815 (JPN)
Debtor	§	

**LAW OFFICES OF JACK J. ROSE, PLLC AND JACK J. ROSE'S  
MOTION TO WITHDRAW AS COUNSEL FOR 2425 WL, LLC**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR RESPECTIVE ATTORNEYS.**

The Law Offices of Jack J. Rose, PLLC (the “Firm”) and Jack J. Rose, a partner with the Firm (together, with the Firm, “Counsel”), file this motion to withdraw as counsel to WL 2425, LLC, (“WL 2425”) in the above-captioned bankruptcy case (the “Motion”) and respectfully states as follows:

### **JURISDICTION**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b). This is a core proceeding pursuant to 28 U.S.C § 157(B). Venue is proper before this Court pursuant to 28 U.S.C §§ 1408 and 1409.

2. The statutory and other bases for the relief requested in this Motion is Rule 83.2 of the Local Rules for the Southern District of Texas (the “Local Rules”).

### **RELIEF REQUESTED**

3. 2425 WL has been represented in this case by attorney Stephen W. Sather of Barron & Newburger, P.C.

4. Counsel has been informed that 2425 WL will continue to be represented in this case by attorney Stephen W. Sather of Barron & Newburger, P.C.

5. Pursuant to Rule 83.2 of the Local Rules for the Southern District of Texas, Counsel respectfully requests to withdraw as counsel for 2425 WL in this matter and all related proceedings and that all applicable notice and service lists, including the Court’s CM/ECF electronic notification list be updated accordingly.

6. Counsel confirms that (a) Counsel has irreconcilable differences with 2425 WL; (b) outstanding amounts previously invoiced to 2425 WL remain unpaid; and (c) Counsel has resigned its representation of 2425 WL; (ii) 2425 WL has accepted Counsel’s resignation; and (iii) 2425 WL directed Counsel to take no further action in this case.

7. The Motion is not bought for the purposes of delay and withdrawal will not cause delay in this case or in any related adversary proceeding, and will not cause any delay or prejudice to any party.

**CONCLUSION**

**WHEREFORE**, Counsel respectfully requests that the Court enter the proposed order attached hereto and grant such other and further relief as may be just.

Dated: April 18, 2024

Respectfully submitted,

**Law Offices of Jack J. Rose, PLLC and  
Jack J. Rose**

/s/ Jack Rose

**Jack J. Rose\***

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\*admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 18th day of April, 2024, he caused a true and correct copy of the foregoing Motion to Withdraw to be served electronically on those parties requesting electronic service through the Court's CM/ECF system.

/s/ Jack Rose

Jack J. Rose

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**ORDER GRANTING LAW OFFICES OF JACK J. ROSE, PLLC  
AND JACK J. ROSE'S MOTION TO WITHDRAW**

Upon consideration of the Law Offices of Jack J. Rose, PLLC and Jack J. Rose's Motion to Withdraw as Counsel for 2425 WL, LLC, it is hereby ORDERED that:

1. The Motion is granted.
2. Jack J. Rose is removed as counsel of record to 2425 WL, LLC in this matter and all related proceedings and all applicable notice and service lists shall be updated accordingly.

IT IS SO ORDERED.

Signed: \_\_\_\_\_, 2024

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**JEFFREY P. NORMAN**  
**UNITED STATES BANKRUPTCY JUDGE**